**Richard Cameron** (202) 637-2225 richard.cameron@lw.com

LATHAM & WATKINS LLP

FIRM / AFFILIATE OFFICES

Tel: (202) 637-2200 Fax: (202) 637-2201

555 Eleventh Street, N.W., Suite 1000

www.lw.com

Washington, D.C. 20004-1304

Boston New Jersey Brussels New York Chicago Northern Virginia

Frankfurt **Orange County** Hamburg Paris San Diego Hong Kong London San Francisco Los Angeles Silicon Valley Singapore Milan Moscow Tokyo

Washington, D.C.

December 14, 2004

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

> Ex Parte Communication, Developing Unified Intercarrier Re:

> > Compensation Regime, CC Docket 01-92

Dear Ms. Dortch:

The undersigned counsel for the Intercarrier Compensation Forum ("ICF") delivered the attached information to Jim Lande of the Wireline Competition Bureau today, at his request. This information models the effect on universal service contribution rates of the ICF's Intercarrier Compensation and Universal Service Reform Plan, including its proposed contribution reforms.

On December 6, 2004, the ICF filed this information for annual Steps 1 and 5 of the ICF Plan. This attachment supplements that filing with similar information for Steps 2, 3, and 4 of the ICF Plan.

Please direct any questions concerning this matter to me at (202) 637-2225.

Very truly yours,

/s/ Richard Cameron

Richard R. Cameron

						Estimate	s @Ste	ep 1		
\$ Millions	Base Period Access Revenue		Remaining Intercarrier Payments *			ımulative cess Shift		ser Revenue elta SLC)	TNRM / ICR Support	
Non-CRTC	\$	7,194	\$	5,560	\$	1,634	\$	1,228	\$	406
CRTC	\$	2,384	\$	1,932	\$	453	\$	117	\$	336
TOTAL	\$	9,578	\$	7,492	\$	2,087	\$	1,345	\$	742
Inc	Increase in High Cost Fund From Changes in Existing High Cost Mechanisms									300
Lifeline Increases From Higher Primary Residential SLC Rates									\$	46
	\$	38								
Grand Total	\$	9,578	\$	7,492	\$	2,087	\$	1,345	\$	1,126

<sup>\*</sup>Remaining Intercarrier Payments for CRTC are understated as EAS / Wireless terminating MOUs are not included in this model Includes Interconnection Transport, Transit Service Revenue, Termination Rate Revenue, and for CRTC only Terminating Transport Charges.

						Estimate	s @Ste	ep 2	
\$ Millions	Base Period Access Revenue		Remaining Intercarrier Payments *			mulative cess Shift		ser Revenue elta SLC)	RM / ICRM upport
Non-CRTC	\$	7,194	\$	3,926	\$	3,268	\$	2,510	\$ 758
CRTC	\$	2,384	\$	1,479	\$	906	\$	231	\$ 675
TOTAL	\$	9,578	\$	5,405	\$	4,173	\$	2,741	\$ 1,432
Inc	rease i	n High Co	st Fund	l From Chai	nges in	Existing Hi	gh Cost	Mechanisms	\$ 300
		Lifeliı	ne Incr	eases From	Highe	r Primary R	esident	ial SLC Rates	\$ 92
	\$ 75								
Grand Total	\$	9,578	\$	5,405	\$	4,173	\$	2,741	\$ 1,899

<sup>\*</sup>Remaining Intercarrier Payments for CRTC are understated as EAS / Wireless terminating MOUs are not included in this model Includes Interconnection Transport, Transit Service Revenue, Termination Rate Revenue, and for CRTC only Terminating Transport Charges.

						Estimate	s @Ste	p 3	
\$ Millions	Base Period Access Revenue		Remaining Intercarrier Payments *			ımulative cess Shift		ser Revenue elta SLC)	RM / ICRM upport
Non-CRTC	\$	7,194	\$	2,253	\$	4,941	\$	4,022	\$ 919
CRTC	\$	2,384	\$	837	\$	1,547	\$	345	\$ 1,203
TOTAL	\$	9,578	\$	3,090	\$	6,488	\$	4,366	\$ 2,122
Inc	Increase in High Cost Fund From Changes in Existing High Cost Mechanisms								\$ 300
Lifeline Increases From Higher Primary Residential SLC Rates									\$ 148
	\$ 113								
Grand Total	\$	9,578	\$	3,090	\$	6,488	\$	4,366	\$ 2,683

<sup>\*</sup>Remaining Intercarrier Payments for CRTC are understated as EAS / Wireless terminating MOUs are not included in this model Includes Interconnection Transport, Transit Service Revenue, Termination Rate Revenue, and for CRTC only Terminating Transport Charges.

						Estimate	s @Ste	ep 4		
\$ Millions	Base Period Access Revenue		Remaining Intercarrier Payments *			mulative cess Shift		ser Revenue elta SLC)		RM / ICRM upport
Non-CRTC	\$	7,194	\$	659	\$	6,536	\$	5,491	\$	1,044
CRTC	\$	2,384	\$	573	\$	1,811	\$	472	\$	1,339
TOTAL	\$	9,578	\$	1,232	\$	8,347	\$	5,963	\$	2,383
Inc	Increase in High Cost Fund From Changes in Existing High Cost Mechanisms									300
Lifeline Increases From Higher Primary Residential SLC Rates									\$	200
	\$	150								
Grand Total	\$	9,578	\$	1,232	\$	8,347	\$	5,963	\$	3,033

<sup>\*</sup>Remaining Intercarrier Payments for CRTC are understated as EAS / Wireless terminating MOUs are not included in this model Includes Interconnection Transport, Transit Service Revenue, Termination Rate Revenue, and for CRTC only Terminating Transport Charges.

	Estimates @Step 5									
\$ Millions	Base Period Access Revenue		Remaining Intercarrier Payments *		Cumulative Access Shift			ıser Revenue Delta SLC)		RM / ICRM Support
Non-CRTC	8	7,194	\$	659	\$	6,536	\$	5,778	\$	757
CRTC	\$	2,384	\$	573	\$	1,811	\$	566	\$	1,246
TOTAL	\$	9,578	\$	1,232	\$	8,347	\$	6,344	\$	2,003
1	Increase in High Cost Fund From Changes in Existing High Cost Mechanisms									
Lifeline Increases From Higher Primary Residential SLC Rates										216
	\$	150								
Grand Total	\$	9,578	\$	1,232	\$	8,347	\$	6,344	\$	2,669

<sup>\*</sup>Remaining Intercarrier Payments for CRTC are understated as EAS / Wireless terminating MOUs are not included in this model Includes Interconnection Transport, Transit Service Revenue, Termination Rate Revenue, and for CRTC only Terminating Transport Charges.

P	reli	minary E	Est	imates o	f L	JSF per u	ni	t				
		2004	Step 1			Step 2		Step 3		Step 4		Step 5
Assessment Per Unit Per Month	\$	1.05	\$	1.23	\$	1.31	\$	1.41	\$	1.40	\$	1.34
Revenue (\$ Thousands)												
BaselineUSF	\$	6,521,269	\$	6,521,269	\$	6,521,269	\$	6,521,269	\$	6,521,269	\$	6,521,269
Overlay from the lifting of rural cap	\$	-	\$	300,000	\$	300,000	\$	300,000	\$	300,000	\$	300,000
Overlay from Lifeline due to increase in SLC	\$	-	\$	46,484	\$	91,950	\$	148,175	\$	200,164	\$	215,893
Net Settlements Not in the base			\$	37,500	\$	75,000	\$	112,500	\$	150,000	\$	150,000
ICF Increase to the USF	\$	-	\$	741,647	\$	1,432,358	\$	2,122,005	\$	2,383,168	\$	2,002,616
Total USF	\$	6,521,269	\$	7,646,900	\$	8,420,577	\$	9,203,949	\$	9,554,601	\$	9,189,778
						Un	its					
Category		Dec-03 *		Step 1		Step 2		Step 3		Step 4		Step 5
ILEC **	2	298,903,000		298,903,000		299,236,333	-	299,403,000	2	299,903,000	2	299,903,000
ILEC Lifeline Subscribers		5,907,789		5,907,789		5,907,789		5,907,789		5,907,789		5,907,789
CLEC		31,699,000		31,699,000		31,699,000		31,699,000		31,699,000		31,699,000
Cellular/PCS ***	1	07,438,041		107,438,041		123,972,721		132,240,062	1	57,042,082	•	157,042,082
Pager Lines		11,208,000		11,208,000		11,208,000		11,208,000		11,208,000		11,208,000
Toll Free Numbers		22,050,182		22,050,182		22,050,182		22,050,182		22,050,182		22,050,182
Special access +		20,814,774		20,814,774		20,814,774		20,814,774		20,814,774		20,814,774
Total Broadband		27,260,834		27,260,834		27,260,834		27,260,834		27,260,834		27,260,834
Total units available (w/o Lifeline)		19,373,831		519,373,831	Ļ	536,241,845	•	544,675,851	5	69,977,872		569,977,872

<sup>\*</sup> For this analysis, Step 1 Units are used for Dec-03.

12/14/2004 3:45 PM

<sup>\*\*</sup> Rural ILEC primary line is a full unit. Additional lines are phased in 1/2, 2/3, 3/4, 1.00 over four steps.

<sup>\*\*\*</sup> Primary subscriber is a full unit. Additional subscribers are phased in 1/2, 2/3, 3/4, 1.00 over four steps.

<sup>+</sup> Special Access units are weighted (weights are 1, 5, 40, 100 for Tier 1,2,3 and 4, respectively)